

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
MARY BLY, MICHAEL CONNELLY,
SYLVIA DAY, JONATHAN FRANZEN,
JOHN GRISHAM, ELIN HILDERBRAND,
CHRISTINA BAKER KLINE, MAYA
SHANBHAG LANG, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA
ROBINSON, GEORGE SAUNDERS,
SCOTT TUROW, and RACHEL VAIL,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,
OPENAI GP LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION LLC, OPENAI
HOLDINGS LLC, OPENAI STARTUP
FUND I LP, OPENAI STARTUP FUND GP
I LLC, and OPENAI STARTUP FUND
MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS

**MOTION FOR ADMISSION *PRO HAC
VICE***

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Ian R. Bensberg, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Plaintiffs in the above-captioned action.

I am in good standing of the bar of the state of Indiana and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3.

Dated: November 28, 2023

Respectfully submitted,

Ian R. Bensberg

Applicant Signature: /s/ Ian R. Bensberg

Applicant's Name: Ian R. Bensberg

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